

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
MICHAEL SEAN SPEIGHT,)	
)	
Plaintiff)	
)	
v.)	Case No. 1:24-cv-12363-PBS
)	
AMANDA KAELEBLEIN,)	
MICHAEL KAELEBLEIN,)	
NANCY KAELEBLEIN,)	
ERIC STEPHANIE,)	
)	
Defendants)	
_____)	

DEFENDANTS MICHAEL KAELEBLEIN AND NANCY KAELEBLEIN'S
MOTION TO DISMISS 1983 CIVIL RIGHTS COMPLAINT

Defendants Michael Kaelblein and Nancy Kaelblein, by and through their undersigned counsel and pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), reply to Plaintiff's Objection to Motion to Dismiss Filed by Michael Kaelblein and Nancy Kaelblein for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Defendants Michael Kaelblein and Nancy Kaelblein respectfully request that this Court:

- A. Grant their Motion to Dismiss;
- B. Dismiss Plaintiff's claims against them; and
- C. Grant such other and further relief as equity and justice require.

Respectfully submitted,
Michael Kaelblein and Nancy Kaelblein
By their Attorneys
Welts, White & Fontaine, P.C.

Date: 11/21/2024

By: /s/ Nicole Fontaine Dooley
Nicole Fontaine Dooley, Esq.
NH Bar No. 266186
29 Factory St./P.O. Box 507
Nashua, NH 03061-0507
(603) 883-0797
nfontainedooley@lawyersnh.com

CERTIFICATE OF SERVICE

I, Nicole Fontaine Dooley, hereby certify that on November 21, 2024, this document was filed through the ECF system and sent electronically to the registered participants as identified on the notice of electronic filing (NEF) and by first class mail to non-registered participants.

/s/ Nicole Fontaine Dooley
Nicole Fontaine Dooley